

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

MARIA DE LOS A. RIVERA SERRANO

DEBTOR(S)

CASE NUM.: 10-09122 ESL

CHAPTER 13 (ASSET CASE)

DEBTOR'S OBJECTION TO CLAIM #5-1

TO THE HONORABLE COURT:

COMES NOW debtor represented through its undersigned counsel and respectfully, alleges and prays:

Pursuant to Rules 3001(d) & 3007 F.R.B.P., debtor herein submit an opposition to the allowance of claim #5-1 filed by Asoc. De Condomines Brisas de Miraflores based on the following grounds:

1. Creditor Asoc. De Condomines Brisas de Miraflores, filed Proof of Claim in the amount of \$12,764.19 dollars.

2. Debtor objects due to the fact that the claim is not correct, creditor does not include all Trustee payments in the balance. They only included two (2) of thirteen (13) payments. **Enclosed please file find evidence of Trustee disbursement. Exhibit I and II.**

NOTICE: Within thirty (30) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006(f) if you were served by mail, any party against whom this paper has been

served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the Clerk's office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the objection will be deemed unopposed and may be granted unless: (1) the requested relief is forbidden by law; (2) the requested relief is against public policy; or (3) in the opinion of the court, the interest of justice requires otherwise. If you file a timely response, the court may - in its discretion - schedule a hearing.

WHEREFORE debtor respectfully requests of this Honorable Court to grant the present OBJECTION, therefore Claim #5-1 filed by Asoc. De Condomines Brisas de Monteflores to be disallowed.

In San Juan, Puerto Rico, this 21st day of March 2011.

RESPECTFULLY SUBMITTED.

/s/ Marilyn Valdes Ortega

MARILYN VALDES ORTEGA

USDC PR 214711

P.O. Box 195596

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Preferred Home Services, Inc.
PO Box 4069 Bayamón PR 00958-1069
Tel. (787) 740-7900 Fax 269-7845
www.phscollect.com

ACCOUNT STATEMENT CLOSING DATE 12/10/2010
ASOCIACION DE CONDOMINIOS CONDOMINIO BRISAS DE MONTEFLORES
monteflores@phshome.com

HOME ADDRESS:
COND BRISAS DE MONTE FLORES

157-05BL
MARIA DE LOS ANGELES RIVERA SERRANO

DATE	REFERENCE	CHECK NO.	CR	DR	BALANCE
12/01/2009	PREVIOUS BALANCE			13,316.97	13,316.97
6/01/2010	CR ADJS-TRANS D 157-	541289	276.39		13,040.58
6/01/2010	CR ADJS-TRANS D 157	544598	276.39		12,764.19
					12,764.19

Exhibit II

FINANCIAL SUMMARY - CASE 08-01860

Print Page  Printer Friendly MARIA DE LOS ANGELES RIVERA SERRANO paying **\$760.00** MONTHLY

Receipts	Rcpts/Deb Refunds	Disbursements	Adjustments	Trustee Disb	Trustee Adj	Show All
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Limits: Select Start Date Select Claim ID ASOC. COND. COND. BRISAS DE M. FLORES Check Status: Cleared Stale Dated Stop Payment Cancelled Voided Outstanding

Date	Payee	Payee Name	Source / Check	Description	Receipts	Disbursements	Balance
2/18/2010	2	ASOC. COND. COND. BRISAS DE M. FLORES	544598	CREDITOR PAYMENT (PRINCIPAL) - INDIVIDUAL CLOSEOUTS		\$276.39	
1/1/2010	2	ASOC. COND. COND. BRISAS DE M. FLORES	541289	CREDITOR PAYMENT (PRINCIPAL) - MONTHLY DISBURSEMENTS		\$276.39	
11/2/2009	2	ASOC. COND. COND. BRISAS DE M. FLORES	536900	CREDITOR PAYMENT (PRINCIPAL) - MONTHLY DISBURSEMENTS		\$276.39	
9/1/2009	2	ASOC. COND. COND. BRISAS DE M. FLORES	532700	CREDITOR PAYMENT (PRINCIPAL) - MONTHLY DISBURSEMENTS		\$275.62	
7/1/2009	2	ASOC. COND. COND. BRISAS DE M. FLORES	528745	CREDITOR PAYMENT (PRINCIPAL) - MONTHLY DISBURSEMENTS		\$275.62	
6/1/2009	2	ASOC. COND. COND. BRISAS DE M. FLORES	526773	CREDITOR PAYMENT (PRINCIPAL) - MONTHLY DISBURSEMENTS		\$236.74	
5/1/2009	2	ASOC. COND. COND. BRISAS DE M. FLORES	524822	CREDITOR PAYMENT (PRINCIPAL) - MONTHLY DISBURSEMENTS		\$236.74	
4/1/2009	2	ASOC. COND. COND. BRISAS DE M. FLORES	521988	CREDITOR PAYMENT (PRINCIPAL) - MONTHLY DISBURSEMENTS		\$236.75	
3/2/2009	2	ASOC. COND. COND. BRISAS DE M. FLORES	519620	CREDITOR PAYMENT (PRINCIPAL) - MONTHLY DISBURSEMENTS		\$1,183.72	
2/2/2009	2	ASOC. COND. COND. BRISAS DE M. FLORES	517444	CREDITOR PAYMENT (PRINCIPAL) - MONTHLY DISBURSEMENTS		\$236.74	
1/2/2009	2	ASOC. COND. COND. BRISAS DE M. FLORES	515119	CREDITOR PAYMENT (PRINCIPAL) - MONTHLY DISBURSEMENTS		\$236.75	
12/3/2008	2	ASOC. COND. COND. BRISAS DE M. FLORES	512690	CREDITOR PAYMENT (PRINCIPAL) - MONTHLY DISBURSEMENTS		\$236.74	
11/5/2008	2	ASOC. COND. COND. BRISAS DE M. FLORES	510575	CREDITOR PAYMENT (PRINCIPAL) - MONTHLY DISBURSEMENTS		\$163.73	
Totals:					\$0.00	\$4,148.32	

I HEREBY CERTIFY: That I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following:

10-09122-ESL13 Notice will be electronically mailed to:

JOSE RAMON CARRION MORALES
newecfmail@ch13-pr.com

MONSITA LECAROS ARRIBAS
ustpreion21.hr.ecf@usdoj.gov

MARILYN VALDES ORTEGA on behalf of Debtor CARLOS A. ORTIZ ORTIZ
valdeslaw@prtc.net

I HEREBY CERTIFY: That I have mailed by regular mail to all creditors listed.

10-09122-ESL13 Notice will not be electronically mailed to:

ASOC. COND. COND. BRISAS DE M.
FLORES
C/O PREFERRED HOME SERVICES,
INC.
PO BOX 4069
BAYAMON, PR 00958-1069

INTERNAL REVENUE SERVICE
PO BOX 21126
PHILADELPHIA, PA 19114-0326

PR TELEPHONE CO
PO BOX 70239
SAN JUAN, PR 00936

COOP A/C DE GUAYNABO
CARRAZO # 66 BOX-1299
GUAYNABO, PR 00970

R-G MORTGAGE
P.O. BOX 362394
SAN JUAN, PR 00936-2394

DEPARTAMENTO DE HACIENDA
PO BOX 9024140
OFICINA 424 B
SAN JUAN, PR 00902

DEPARTAMENTO DEL TRABAJO
AVE. MUÑOZ RIVERA 505
HATO REY, PR 00918

FEDERAL LITIGATION DEPT OF
JUSTICE
PO BOX 9020192
SAN JUAN, PR 00902-0192

FIRST PREMIER BANK
PO BOX 5519
SIOUX FALLS, SD 57117-5519